

April 22, 2008

Patrick Morris
Janis Cooke
Mercury TMDL Unit
Central Valley Regional Water Quality Control Board
11020 Sun Center Drive, #200
Rancho Cordova, CA 95670

Re: Sacramento/San Joaquin Delta Methyl-Mercury TMDL

Dear Members of the Board,

I would first like to express my appreciation for the work of those who created the Delta Methyl-Mercury TMDL report. The presence of mercury in the Bay/Delta threatens the health of the communities who depend on the wildlife of the region and deserves the attention of this report. It is clear to me that, despite the multitude of problems facing the Delta today, the Central Valley Regional Water Quality Control Board has taken an active effort in understanding the problem of mercury contamination. As a master's student in Community and Regional Development at UC Davis, I work with angler communities along the Delta. For the past eight months I have been working with subsistence anglers both surveying them to learn about consumption habits and working on education efforts. Throughout this time, I have found the TMDL to be an incredibly helpful resource in understanding and explaining the issue at hand.

I do, however, have several comments about the TMDL that I believe would strengthen its impact.

First, I do not believe the document accurately represents the people and communities that depend on Delta fish. Anglers are extremely ethnically and economically diverse and some are economically dependent on locally-caught fish. Some of these subsistence anglers eat highly contaminated fish (often Sturgeon and Striped Bass) as often as ten times per month. While the national standard for fish consumption that the TMDL uses allows for fish consumption at a rate of once a week, many anglers and their families are consuming more often. In not accounting for higher consumption rates, the TMDL in essence excludes this population from any form of protection. The report should, at the very least, recognize that this level of consumption exists and state the goal of including them in all protection efforts.

Second, while the TMDL focuses on the decrease in mercury from current dischargers, it does not focus on the necessary clean-up of abandoned mines throughout the Sierra Nevadas. While I recognize that the Delta is the focus of the TMDL, the report and plan should describe efforts that must be taken to collaborate within the region and water board's jurisdiction, regardless of the TMDL's boundary. [SF1]Environmental problems are not isolated to inside regional or planning boundaries, and clean-up efforts must bridge this seeming divide.

Third, while the decrease in mercury contamination in the Delta will take years, people will continue to fish along these waters. The TMDL expresses the need for education efforts but does not provide any information as to how impacted communities

can or should be involved. Education efforts are less valuable when they come from a state agency than when they come from a community itself. The TMDL should express ways that community organizations can become involved in education efforts to best reach their constituents. Organizations should be involved in the creation of advisory signs and other education materials. Agencies should not expect anglers to cease fishing, and thus should provide information on alternative fish that are healthier to eat. The problem of mercury contamination is incredibly difficult to describe because it is invisible, builds up over years of consumption, and is but one of a massive number of contaminants we may ingest. Involving community members in the process of mercury clean-up, then, is necessary to effectively protect the populations that the TMDL report seems to have in mind.

Thank you for your time.

Best,

Aubrey White
Graduate Student
Community and Regional Development
UC Davis